

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Patricia D. Sample : No. 20-11242-AMC
Debtor : :

ANSWER TO MOTION OF MIDFIRST BANK
FOR RELIEF FROM THE AUTOMATIC STAY

Debtor, by her Attorney David M. Offen, respectfully submits the following:

The debtor's employment has been furloughed as a result of the statewide shutdown due to COVID-19 and she has not yet received her unemployment compensation. The Movant has permission to speak directly with Patricia D. Sample to offer any assistance, forbearance, or deferments provided for her under the CARES Act with the goal being to help the debtor reorganize the post-petition arrears and resume regular payments when possible.

WHEREFORE, Debtor respectfully requests this Honorable Court to deny Movant's Order granting relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 5/14/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of Midfirst Bank
Bkgroup@kmlawgroup.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 5/14/20